

7/28/08

Ms. Leah S. Palmer  
Mr. Jeff Pope  
Senior Campaign Finance Analysts  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Palmer and Mr. Pope:

John McCain 2008 (FEC ID# C00430470) is in receipt of your Request for Additional Information dated June 25, 2008, referencing our amended April Monthly 2008 FEC report filed on May 20, 2008.

The Committee's response follows.

The Committee reports all refunds on Schedule BP for Lines 28a and 28c, as noted in your letter. The transactions on Line 17 that you reference are memo entries included for the purpose of reflecting a correct cycle-to-date total for the donors, and are consistent with the manner in which refunds have been reported in past presidential cycles. Further, as memo entries, they do not affect the Committee's totals for receipts or ending cash. While there is therefore no need to amend any prior reports, the Committee (beginning with the July Monthly 2008 report filed on July 18, 2008) will as you requested no longer include these clarifying memo entries on its FEC reports.

John McCain 2008 (FEC ID# C00430470) is also in receipt of your Request for Additional Information dated June 25, 2008, referencing our amended May Monthly 2008 FEC report filed on June 20, 2008.

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#### Schedule A-P

In accordance with 11 CFR 110, and as a part of its regular contributions screening process, the Committee reviews each contribution received for possible regulatory related issues. All contributions received by the Committee that exceed the contribution limits are reattributed, redesignated or refunded pursuant to the procedures and time frame limits set forth in 11 CFR 110.1(k)(3)(ii)B and 11 CFR 110.1(b)(3)(i). In addition, the Committee takes the additional step of noting, via memo text language associated with each such transaction entry, that the Committee is taking all reasonable actions to remedy any potential contribution limit issue.

The May Monthly 2008 amended report filed on July 28, 2008 includes two redesignations for Mr. Douglas L. DeVos and Mr. Richard M. DeVos Sr. which represent presumptive redesignations. The presumptive redesignation letters were mailed on April 28, 2008 to both donors, but the redesignations were inadvertently excluded from our previous May Monthly 2008 filing.

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We have reviewed the listing of contributors on the RFAI addendum titled "Excessive and/or Prohibited Contributions." Any necessary changes have been reflected on the amended May Monthly 2008 report filed on July 28, 2008. For all other relevant donors on the list, as noted in the memo text for each relevant transaction on the amended May Monthly 2008 report, a reattribution, redesignation, or a refund has been processed and those transactions were reported on the June Monthly 2008 report or on the July Monthly 2008 report, or will be reported on the August Monthly 2008 report.

Additional donors on your list of potential excessives are incorrectly included even though the contributors are reported with different addresses, different middle initials, or distinctive suffixes (Jr., Sr., etc). The Committee has researched each donor, and can confirm that the donors are unique and are correct as disclosed.

If you have questions or need further information regarding this response, please contact Kevin Broghamer at (703) 650-5642 or email [kbrogamer@mccain08HQ.com](mailto:kbrogamer@mccain08HQ.com).

Sincerely,

Joseph Schmuckler, Treasurer  
John McCain 2008

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